

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	Case No.: 24-21217-CMB
SOUTH HILLS OPERATIONS, LLC, <i>et al.</i> , ¹	Chapter 11
Debtors.	<i>Jointly Administered</i>
	Doc. No.:
SOUTH HILLS OPERATIONS, LLC, <i>et al.</i> ,	Related to Document No. 28
Movant,	Hearing Date: June 13, 2024
-vs -	Hearing Time: 10:00 a.m.
CIBC BANK, USA, GPH CANONSBURG LP, GPH MONROEVILLE LP, GPH MURRYSVILLE LP, GPH MT. LEBANON LP, and PENNSYLVANIA DEPARTMENT OF HUMAN SERVICES	Response Deadline: 4:00 PM (EST) on June 10, 2024
Respondents.	

**NOTICE REGARDING ENTRY OF REVISED INTERIM ORDER
(I) AUTHORIZING THE CUARZO DEBTORS TO OBTAIN POSTPETITION
FINANCING, (II) AUTHORIZING THE CUARZO DEBTORS USE OF CASH
COLLATERAL, (III) GRANTING LIENS AND PROVIDING SUPERPRIORITY
ADMINISTRATIVE EXPENSE STATUS, (IV) GRANTING ADEQUATE PROTECTION,
(V) MODIFYING THE AUTOMATIC STAY, (VI) SCHEDULING A FINAL HEARING,
AND (VII) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that, on May 17, 2024, the Debtors filed the *Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Cuarzo Debtors to Obtain Postpetition Financing, (II) Authorizing the Cuarzo Debtors use of Cash Collateral, (III)*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: South Hills Operations, LLC (5527); Monroeville Operations, LLC (3280); Mt. Lebanon Operations, LLC (1133); Murrys ville Operations, LLC (9149); Cheswick Rehabilitation and Wellness Center, LLC (9561); 3876 Saxonburg Boulevard Propco, LLC (3618); North Strabane Rehabilitation and Wellness Center, LLC (1677); 100 Tandem Village Road Propco, LLC (1918); Maybrook-C Briarcliff Opco, LLC (5187); Maybrook-C Briarcliff Propco, LLC (1823); Maybrook-C Evergreen Opco, LLC (5388); Maybrook-C Evergreen Propco, LLC (2000); Maybrook-C Kade Opco, LLC (4033); Maybrook-C Kade Propco, LLC (2097); Maybrook-C Latrobe Opco, LLC (4148); Maybrook-C Latrobe Propco, LLC (2178); Maybrook-C Overlook Opco, LLC (7081); Maybrook-C Overlook Propco, LLC (6804); Maybrook-C Silver Oaks Opco, LLC (7146); Maybrook-C Silver Oaks Propco, LLC (9654); Maybrook-C Whitecliff Opco, LLC (6211); Maybrook-C Whitecliff Propco, LLC (4835). The Debtors' address is 485 Lexington Avenue, 10th Floor, New York, NY 10017.

Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Doc. No. 28] (the “Cuarzo DIP Motion”).

PLEASE TAKE FURTHER NOTICE that, on May 21, 2024, the Court entered the revised *Interim Order (I) Authorizing the Cuarzo Debtors to Obtain Postpetition Financing, (II) Authorizing the Cuarzo Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief* [Doc. No. 81] (the “Cuarzo Interim DIP Order”).

PLEASE TAKE FURTHER NOTICE that the hearing to consider entry of the Final Order² s is scheduled for **June 13, 2024, at 10:00 AM (Prevailing Eastern time)** before the Honorable Carlota M. Böhm, Courtroom B, 54th Floor, U.S. Steel Tower, 600 Grant Street, Pittsburgh, PA 15219. Unless otherwise ordered, parties may also appear for non-evidentiary matters remotely by utilizing the Zoom video conference platform (“Zoom”). To participate in the hearing via Zoom, use the following link no later than ten (10) minutes prior to your scheduled hearing time: <https://www.zoomgov.com/j/16143800191>. Alternatively, connect with Zoom by using the following Meeting ID: 161 4380 0191. ALL HEARING PARTICIPANTS ARE REQUIRED TO REVIEW AND COMPLY WITH THE ZOOM PROCEDURES, which can be found at: <https://www.pawb.uscourts.gov/sites/default/files/pdfs/cmb-proc-videohrg.pdf>. For questions regarding Zoom connection, contact Judge Böhm's Chambers at 412-644-4328.

PLEASE TAKE FURTHER NOTICE that any party in interest objecting to the entry of the Final Order shall file written objections with the Clerk of the Court by no later than **4:00 PM (Prevailing Eastern time) on June 10, 2024**, which objections shall be served so as to be received on or before such date by: (i) proposed counsel to the Debtors, Bass, Berry & Sims, PLC, 150 Third Ave. S., Suite 2800, Nashville, Tennessee 37201, Attn: Glenn B. Rose (grose@bassberry.com); (ii) proposed local counsel to the Debtors, Whiteford, Taylor & Preston, L.L.P., 11 Stanwix St., Suite 1400, Pittsburgh, Pennsylvania 15222, Attn: Daniel R. Schimizzi (dschimizzi@wtplaw.com); (iii) counsel for the Cuarzo DIP Lender, Elizabeth A. Green and Andrew Layden, BakerHostetler, 200 South Orange Avenue, Suite 2300, Orlando, FL 32801; egreen@bakerlaw.com; alayden@bakerlaw.com; (iv) counsel to the Committee (if appointed); and (iv) the U.S. Trustee.

PLEASE TAKE FURTHER NOTICE that additional information regarding the above-captioned chapter 11 cases can be obtained, free of charge, by: (i) visiting <https://omniagentsolutions.com/SouthHills> [omniagentsolutions.com]; (ii) calling 866-989-6144 (US & Canada toll free) and 747-288-9439 (International); or (iii) sending an email to southhillsinquiries@omniagnt.com.

² Capitalized terms not otherwise defined herein shall have the same definitions as ascribed to them in the Cuarzo DIP Motion or the Cuarzo Interim DIP Order, as applicable.

Dated May 22, 2024
Pittsburgh, Pennsylvania

Respectfully submitted:

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/s/ Daniel R. Schimizzi

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*Proposed Local Counsel to the Debtors and
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-AND-

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